



SANTA CRUZ COUNTY REGIONAL TRANSPORTATION COMMISSION

1523 Pacific Ave., Santa Cruz, CA 95060-3911 • (831) 460-3200 FAX (831) 460-3215 EMAIL info@sccrtc.org

Cynthia Bryant, Director
California Office of Planning and Research
P.O. Box 3022
Sacramento, CA 95812-3044

January 30, 2009

RE: Preliminary Draft CEQA Guideline Amendments for Greenhouse Gas Emissions

Dear Ms. Bryant,

The Santa Cruz County Regional Transportation Commission (SCCRTC), which serves as the Regional Transportation Planning Agency for Santa Cruz County, reviewed the proposed CEQA guideline amendments related to the analysis of the potential effect of projects on greenhouse gas emissions. SCCRTC staff understands the complexity of addressing a global environmental issue through a state environmental review process and appreciates the effort of the Office of Planning and Research (OPR) to carefully draft these guidelines. Since local transportation agencies will be directly involved in implementing these guidelines, please consider the following comments on the Preliminary Draft CEQA Guidelines Amendments for Greenhouse Gas Emissions from SCCRTC staff.

- ◆ SCCRTC staff supports the OPR's recognition of programmatic strategies as the preferred method for mitigating greenhouse gas emissions and their potential effects. Greenhouse gas emissions are typically associated with specific sectors, rather than a particular project, and warrant a programmatic approach to mitigation.
- ◆ SCCRTC staff strongly agrees that the thresholds of significance for potential greenhouse gas emissions and their effect must be left up to local agencies, consistent with current CEQA practices. The SCCRTC staff recognizes that due to the newness of greenhouse gas emissions requirements, many agencies have not yet adopted a method for determining the standards of effects of greenhouse gas emissions and therefore local agencies may look to the California Air Resources Board Technical staff's recommendation for a method of adopting thresholds. However, a local agency's adopted greenhouse gas emission thresholds of significance may be the result of a combination of standards and must be able to address local circumstances.
- ◆ SCCRTC staff recommends the removal of Section 15064.4,(a),1 because it may conflict with a region's ability to meet regional targets by tying a specific project's potential impacts to attaining the State's greenhouse gas emission targets, rather than assessing a region's comprehensive approach to meeting regional targets, which are presumably consistent with state greenhouse gas emission goals.

- ♦ The CEQA Guidelines Initial Study Checklist XVI., a) should be modified to say, "Result in a substantial increase in number of vehicle trips, vehicle delay or vehicle miles traveled above the amount anticipated in locally adopted plans." Roadway vehicle capacity is not an effective way of assessing potential new greenhouse gas emissions generated by a project. Also, a local or region specific greenhouse gas emission mitigation plan will already address potential effects of green house gas emissions of planned projects. Only greenhouse gas emissions generated above this planned and mitigated amount need to be identified.

Thank you for considering these comments. Please contact Grace Blakeslee of my staff, (831) 460-3219, if you have questions.

Sincerely,

A handwritten signature in black ink, appearing to read "George Dondero", with a long horizontal flourish extending to the right.

George Dondero
Executive Director